

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA**

Nautilus Insurance Company,

Plaintiff,

vs.

Richard Alexander Murdaugh, Sr., Cory  
Fleming, Moss & Kuhn, P.A., Chad  
Westendorf, and Palmetto State Bank,

Defendants.

C/A#: 2:22-cv-1307-RMG

**CO-RECEIVERS PETER M. MCCOY  
AND JOHN T. RESPONSES TO  
PLAINTIFF'S REQUESTS FOR  
PRODUCTION OF DOCUMENTS LAY  
ON BEHALF OF DEFENDANT  
RICHARD ALEXANDER  
MURDAUGH'S**

**TO: JAAN G. RANNIK AND CLINTON T. MAGILL, ATTORNEYS FOR PLAINTIFF:**

Pursuant to the South Carolina Rules of Civil Procedure, Defendant, by and through the undersigned counsel, hereby submits responses to requests for production propounded by Plaintiff, as follows:

**GENERAL OBJECTIONS**

A. Defendant objects to these requests to the extent that they call for information and material that is protected from disclosure by the attorney/client privilege, the work product doctrine, trade secrecy or any other applicable privilege law or rule.

B. Defendant's responses to these requests do not constitute an admission or acknowledgement that any such information is relevant to any issue in the litigation between the parties or that such document or documents referenced by any response is responsive to any request.

C. Defendant objects to these requests to the extent that they attempt, whether individually or collectively, to impose a burden on Defendant that exceed the requirements of the South Carolina Rules of Civil Procedure.

D. In a good faith effort to comply with the South Carolina Rules of Civil Procedure, Defendant may disclose and/or produce documents or materials contained within its insurer's claim file. In doing so, Defendant does not waive rights to claim privilege on and specific contents of the claim file not produced that may reasonably be subject to a recognized privilege, and Defendant expressly reserves the right to assert such privilege(s) throughout the course of this litigation.

### **RESPONSES TO REQUEST FOR PRODUCTION**

1. A COPY OF EVERY CANCELED CHECK WRITTEN TO Gloria Satterfield from any bank account on which you had an ownership interest from January 1, 2015 - February 2, 2018.

#### **RESPONSE:**

**The Co-Receivers are unable to provide such information as it is not clear what Alex Murdaugh has in his possession, if anything, responsive to this request.**

2. A copy of the check or canceled check written to Gloria Satterfield that was to be collected on February 2, 2018

#### **RESPONSE:**

**The Co-Receivers are unable to provide such information as it is not clear what Alex Murdaugh has in his possession, if anything, responsive to this request.**

3. All materials you produced in response to a subpoena - including from the South Carolina Department of Disciplinary Counsel, South Carolina Law Enforcement Division, the Federal Bureau of Investigation, the United States Attorney's Office, or any other person or entity – in connection with investigations into Alex Murdaugh, Cory Fleming, and/or Russell Laffitte.

#### **RESPONSE:**

**The Co-Receivers are unable to provide such information as it is not clear what Alex Murdaugh has in his possession, if anything, responsive to this request.**

4. All communications with Cory Fleming regarding the Satterfields and/or the Satterfield Claim from January 1, 2017 to present.

**RESPONSE:**

**The Co-Receivers are unable to provide such information as it is not clear what Alex Murdaugh has in his possession, if anything, responsive to this request.**

5. All correspondence or recorded communications with anyone – including Brian Harriott, Michael Anthony Satterfield, Lynn Davidson, Chad Westendorf, Cory Fleming, Russell Laffitte, any employee or agent of Palmetto State Bank, any employee or agent of Moss & Kuhn, P.A. (formerly Moss, Kuhn, & Fleming, P.A.) – regarding the Satterfield Claim.

**RESPONSE:**

**The Co-Receivers are unable to provide such information as it is not clear what Alex Murdaugh has in his possession, if anything, responsive to this request.**

6. All communications with Russell Laffitte regarding loans made to you or to Mr. Laffitte from funds belonging to any of your clients.

**RESPONSE:**

**The Co-Receivers are unable to provide such information as it is not clear what Alex Murdaugh has in his possession, if anything, responsive to this request.**

7. Cell phone records showing the date, time, and duration of calls to or from Russell Laffitte and/or Cory Fleming from January 1, 2015 to July 1, 2021.

**RESPONSE:**

**The Co-Receivers are unable to provide such information as it is not clear what Alex Murdaugh has in his possession, if anything, responsive to this request.**

8. All records, including bank statements and notices, relating to the bank account(s) you opened in the name of “Forge”.

**RESPONSE:**

**The Co-Receivers are unable to provide such information as it is not clear what Alex Murdaugh has in his possession, if anything, responsive to this request.**

9. Your complete file relating to your representation of the family of Hakeem Pinckney, including all communications between you and Cory Fleming or Russell Laffitte relating to the same or relating to Cory Fleming’s representation of Pamela Pinckney.

**RESPONSE:**

**The Co-Receivers are unable to provide such information as it is not clear what Alex Murdaugh has in his possession, if anything, responsive to this request.**

10. All records reflecting the receipt or distribution of funds relating to your representation of the family of Hakeem Pinckney.

**RESPONSE:**

**The Co-Receivers are unable to provide such information as it is not clear what Alex Murdaugh has in his possession, if anything, responsive to this request.**

11. Permit entry onto and inspection of Moselle by Nautilus’ representatives pursuant to Rule 34(a)(2), F.R.C.P. within thirty (30) days of service of these requests.

**RESPONSE:**

**Moselle is currently in the possession of the Estate of Margaret B. Murdaugh.**

The Receivers reserve the right to supplement these responses as discovery in this case progresses until trial.

**McCoy Law Group, LLC**

/s/Peter M. McCoy

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September 19, 2022